

# **Exhibit B**



Haddon, Morgan and Foreman, P.C.  
Laura A. Menninger

150 East 10th Avenue  
Denver, Colorado 80203  
PH 303.831.7364 FX 303.832.2628  
www.hmflaw.com  
LMenninger@hmflaw.com

November 27, 2021

Maurene Comey  
Alison Moe  
Lara Pomerantz  
Andrew Rohrbach  
United States Attorney's Office  
Southern District of New York  
1 St. Andrew's Plaza  
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Counsel:

I write pursuant to the Court's Order of November 23, 2021 directing a supplement to the disclosure for Certified Forensic Examiner Robert Kelso's expert opinion to the extent he intends to offer rebuttal testimony to any opinions offered in the government's original disclosure for Stephen Flatley, dated September 15, 2021.

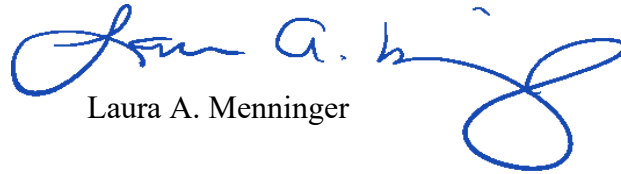
I note that yesterday you provided a supplemental notice for Mr. Flatley. That supplement was untimely. Thus, we intend to object at trial to the admission of any opinions from Mr. Flatley not included in your September 15, 2021 disclosure. This supplement for Mr. Kelso does not purport to respond to anything contained in your Flatley supplement.

We anticipate that Mr. Kelso will testify about the meaning of certain pieces of metadata associated with computers and computer files, such as "Authors," "Last saved by," "Registered Organization," and "Registered Owner" and potentially others. Mr. Kelso will testify about where the data contained in these types of metadata fields originates and how it propagates. Mr. Kelso will testify that a particular value in one or more of these metadata fields, such as a version of person's name, does not necessarily mean that person authored the underlying documents or had any interaction with the documents. This testimony may cover any exhibits offered by the Government.

Mr. Kelso's testimony may also encompass the metadata associated with defense exhibits, including testimony about the values contained in certain metadata fields and their meaning. Because the defense cannot anticipate at this juncture which exhibits may be necessary, depending upon evidence offered by the government during its case in chief, the defense reserves the right to disclose the metadata testimony from Mr. Kelso at the same time it identifies any particular exhibit that it will introduce as impeachment or rebuttal exhibits.

Ms. Comey, Moe and Pomerantz  
November 27, 2021  
Page 2

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Laura A. Menninger", with a large, stylized loop at the end.

Laura A. Menninger

CC: Counsel of Record *via* email